

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Vernon Robert Ancrum
 Debtor

Fay Servicing, LLC as servicer for
LSF9 Master Participation Trust
Movant

v.

Vernon Robert Ancrum
Angela Ancrum
Scott F. Waterman - Trustee
Respondents

CASE NO.: 21-11568-amc

CHAPTER 13

JUDGE: Ashely M. Chan

AMENDED CERTIFICATION OF DEFAULT

FRIEDMAN VARTOLO, LLP, attorneys for Movant, hereby certifies that the above-captioned Debtor has failed to comply with the terms of the Stipulation approved by the U.S. Bankruptcy Chief Judge Ashely M. Chan on May 4, 2022. A copy of the Stipulation is attached hereto as **Exhibit "A"**. Movant certifies that the required Notice of Default required by the Order was sent to Debtor and Debtor's attorney on April 19, 2023, and Debtor has failed to cure the default. A copy of the Notice of Default is attached hereto as **Exhibit "B"**. In accordance with the terms of said Stipulation agreed to by the parties, the Automatic Stay is hereby lifted as to permit Movant to proceed with their State Court remedies upon Debtor's property.

Dated: July 20, 2023

By: /s/ Lauren Moyer
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